

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
WONDERWORK, INC.,	:	Case No. 16-13607 (SMB)
	:	
Debtor.	:	
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DECLARATION OF JOSEPH MULLANEY
IN OPPOSITION TO HELPMESSEE'S MOTION TO APPOINT A TRUSTEE

I, Joseph Mullaney, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief.

1. I am a named creditor of WonderWork, Inc. ("WonderWork"), the debtor in this proceeding.

2. I submit this declaration in opposition to HelpMeSee's motion to appoint a trustee, both in my capacity as a creditor and as Brian Mullaney's ("Brian") father.

Position as a Creditor

3. I am a substantial creditor, holding unsecured claims against WonderWork totaling \$110,750. I became a creditor as a result of an outstanding loan (the "Loan") extended to WonderWork as of August 8, 2013.

4. The purpose of the Loan was to generate additional funding for WonderWork's programs and thereby facilitate the charity's mission of sponsoring free surgeries for individuals in developing countries who cannot afford medical treatment. This loan is referred to as an "impact loan" because its aim was to generate a positive financial impact for the public good.

Opposition to Motion

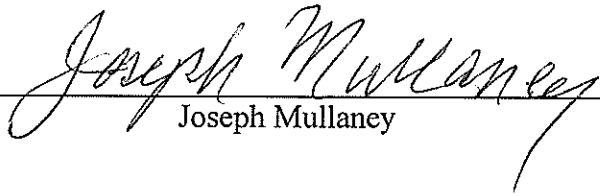
5. I am aware of HelpMeSee's motion to appoint a trustee and it is, without question, contrary to my interest as a creditor. Although HelpMeSee alleges the appointment of a trustee is in the best interests of WonderWork's creditors and estate, I do not support HelpMeSee's motion. In fact, I believe that preserving Brian's position as WonderWork's CEO and Co-Founder, and the rest of the organization's management, is in my best interest and the best interest of the bankruptcy estate.

6. I extended the Loan to WonderWork due, in large part, to Brian's extensive experience as a nonprofit leader, his valuable partnerships with health care providers in developing countries, and his impressive fundraising abilities. I have been involved with WonderWork since 2010. In this time Brian has demonstrated himself as an honest, trustworthy and effective officer. The removal of Brian as CEO, or his talented management team, would certainly be against my interest in watching WonderWork flourish as a charity.

7. I am confident that WonderWork's current management will offer a comprehensive plan for reorganization, one that will allow it to satisfy my claims and emerge from bankruptcy. In order to do so, WonderWork desperately needs its leadership to guide the charity through this bankruptcy proceeding and beyond. Brian and his team had my vote of confidence when the Loan was extended and they have my vote of confidence now.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: Feb 14, 2017
Vero Beach, Florida



Joseph Mullaney